

UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF TENNESSEE  
WESTERN DIVISION

IN RE:

TAWANA C. ALLEN,

Debtor(s)  
and Plaintiff(s),

v.

WELLS FARGO FINANCIAL TN,

Defendant(s).

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Chapter 13 Case  
Case No. 10-25932-E

Adversary Proceeding  
No.

**COMPLAINT FOR TURNOVER OF PROPERTY**

Come(s) now your Debtor and Plaintiff(s) in this matter, Tawana C. Allen, and respectfully state(s) to the Court as follows:

1. Debtor(s)/Plaintiff(s) filed the Chapter 13 case on June 02, 2010.
2. This is an adversary proceeding brought pursuant to Fed. R. Bankr. P. 700(1) and 11 U.S.C. Section 542(a) to recover funds in the amount of \$876.77 which were paid to Defendant.
3. That this Court has jurisdiction under the provision of 28 U.S. C. Sections 1334, 151 and 157(a).
4. That by virtue of 28 U.S.C. Section 157(b)(2)(E), this is a core proceeding. See also Fed. R. Bankr. P. 7008(a).

5. That under the particular facts and circumstances and applicable law the Plaintiff is entitled to possession of the above-described property of the estate for “use” as contemplated in 11 U.S.C. Section 363.

WHEREFORE, Plaintiff(s) respectfully pray(s) for an expedited hearing and order directing turnover of the above-described property of the estate from the Defendant-Creditor.

Respectfully submitted,  
LONG, UMSTED & JONES

By: /s/Allen C. Jones, #J41006  
Attorney for Debtor(s)/Plaintiff(s)  
314 Poplar Avenue  
Memphis, Tennessee 38103  
Phone: (901) 522-9316  
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#### **CERTIFICATE OF SERVICE**

I certify that copies of this document were sent to the following by U.S. Mail and/or email on January 29, 2014.

/s/Allen C. Jones

Debtor(s)  
Trustee

Wells Fargo Financial TN  
4137 121<sup>st</sup> Street  
Urbandale, IA 50323